

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KIMBERLY KJESSLER, KLAIRE RUECKERT,
LAURA BRALEY, TIMOTHY HAYDEN and
SUMMER LANG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

ZAAPPAAZ, INC., AZIM MAKANOJIYA,
NETBRANDS MEDIA CORP., MASHNOON
AHMED, GENNEX MEDIA, LLC, BRANDECO,
L.L.C., AKIL KURJI, CUSTOM WRISTBANDS
INC., and CHRISTOPHER ANGELES,

Defendants.

Civil Action No. 4:18-cv-0430

**PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL THE PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on October 14, 2020 at 10:00 a.m. or at such other date and time as the Court may set, in Courtroom 9015 of the United States District Court for the Southern District of Texas, located at 515 Rusk Street, Houston, Texas, Plaintiffs' Counsel, on behalf of a proposed Settlement Class of direct purchasers of certain customized promotional products, will and hereby do move the Court for an order granting final approval of the Class Action Settlement in this matter.

Submitted herewith in support of Plaintiffs' Motion for Final Approval of Class Action Settlement are (i) the Memorandum in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement; (ii) the Declaration of Warren T. Burns; (iii) the Declaration of Markham Sherwood and exhibit thereto; and (iv) the [Proposed] Order Approving Settlement.

Date: September 9, 2020

Respectfully submitted,

BURNS CHAREST LLP

By: /s/ Warren T. Burns

Warren T. Burns
TSB# 24053119
SD Tex #611613
900 Jackson Street, Suite 500
Dallas, TX 75202
Telephone: (469) 904-4550
Facsimile: (469) 444-5002
Email: wburns@burnscharest.com

Christopher J. Cormier (*Pro Hac Vice*)
4725 Wisconsin Ave. NW, Suite 200
Washington, D.C. 20016
Telephone: (202) 577-3977
Email: ccormier@burnscharest.com

Korey A. Nelson (*Pro Hac Vice*)
Lydia A. Wright (*Pro Hac Vice*)
365 Canal Street, Suite 1170
New Orleans, LA 70130
Telephone: (504) 799-2845
Email: knelson@burnscharest.com
lwright@burnscharest.com

***Interim Lead Counsel for Plaintiffs and the
Proposed Class***

WOLF HALDENSTEIN
ADLER FREEMAN & HERZ LLP
Thomas H. Burt (*Pro Hac Vice*)
270 Madison Avenue
New York, New York 10016
Telephone: (212) 545-4600
Facsimile: (212) 686-0114
Email: burt@whafh.com

Betsy C. Manifold (*Pro Hac Vice*)
750 B Street, Suite 2770
San Diego, CA 92101
Telephone: (619) 239-4599
Facsimile: (619) 234-4599

Email: manifold@whafh.com

Carl V. Malmstrom (*Pro Hac Vice*)
111 W. Jackson Blvd., Suite 1700
Chicago, Illinois 60604
Telephone: (312) 391-5059
Email: malmstrom@whafh.com

STOLL STOLL BERNE LOKTING &
SHLACHTER P.C.

Keith S. Dubanevich
TSB# 06144150
SD Tex# 1451
209 SW Oak Street, Suite 500
Portland, OR 97204
Telephone: (503) 227-1600
Facsimile: (503) 227-6840
Email: kdubanevich@stollberne.com

LEVIN SEDRAN & BERMAN LLP

Austin Cohen (*Pro Hac Vice*)
Keith J. Verrier (*Pro Hac Vice*)
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500
Email: acohen@lfsblaw.com
kverrier@lfsblaw.com

GUSTAFSON GLUEK PLLC

Daniel E. Gustafson (*Pro Hac Vice*)
Daniel C. Hedlund (*Pro Hac Vice*)
Michelle J. Looby (*Pro Hac Vice*)
Kaitlyn L. Dennis (*to be submitted Pro Hac Vice*)
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Email: dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
kdennis@gustafsongluek.com

RADICE LAW FIRM, P.C.

John Daniel Radice
34 Sunset Blvd.
Long Beach, NJ 08008
Telephone: (646) 245-8502

HEIM PAYNE CHORUSH LLP

Christopher Michael First
Miranda Yan Jones
1111 Bagby Street, Suite 2100
Houston, TX 77002
Telephone: (713) 221-2000
Facsimile: (713) 22-2021
Email: cfirst@hpcllp.com
mjones@hpcllp.com

GRABAR LAW OFFICE
Joshua H. Grabar
1735 Market Street, Suite 3750
Philadelphia, PA 19103
Telephone: (267) 507-6085
Email: jgrabar@grabarlaw.com

EDELSON & ASSOCIATES LLC
Marc Edelson
3 Terry Drive, Suite 205
Newtown, PA 18940
Telephone: (215) 867-2399
Email: medelson@edelson-law.com

WELTMAN LAW LLC
Stewart Weltman
3841 N. Wayne Ave.
Chicago, Illinois 60613
Telephone: (312) 504.1988
Email: sweltman@weltmanlawfirm.com

Additional Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF CONFERENCE

I certify that Plaintiffs conferred with Defendants about the relief requested in this motion pursuant to Section 7.A.1.-2. of this Court's Procedures and Forms. They are unopposed to the relief requested.

By: /s/ Warren T. Burns

Warren T. Burns

CERTIFICATE OF SERVICE

I certify that on September 9, 2020, I caused a true copy of the above document to be served electronically upon all counsel of record via the Court's CM/ECF system.

By: /s/ Warren T. Burns

Warren T. Burns